

SOUTHERN DISTRICT OF NEW YORK

KINGSTOWN CAPITAL MANAGEMENT, L.P.;
KINGSTOWN PARTNERS MASTER LTD.;
KINGSTOWN PARTNERS II, L.P.; KTOWN, LP;
KINGSTOWN CAPITAL PARTNERS LLC;
INVESTHOLD LTD; AND VERALI LIMITED,

Plaintiff,

-against-

RADOVAN VITEK; CPI PROPERTY GROUP,
S.A.; J&T BANKA, A.S.; POSTOVA BANKA, A.S.;
JAN GERNER; MILADA MALA; JEAN
FRANÇOIS OTT; LUMIR SAFRANEK; PAVEL
SPANKO; AND JULIUS STRAPEK,

Defendants.

Civil Action No.: 19-cv-03170 (DC)

DEFENDANT JULIUS STRAPEK'S NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT, upon the accompanying Declaration of Julius Strapek and Memorandum of Law in Support of Defendant Julius Strapek's Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and upon all pleadings and prior proceedings herein, Defendant Julius Strapek will move this Court before the Honorable Denise L. Cote, U.S.D.J., United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Rule 12 of the Federal Rules of Civil Procedure dismissing the Complaint as to Mr. Strapek, and for all other relief that this Court deems just and proper.

Dated: September 10, 2019

Respectfully submitted,

CHELNEY LAW GROUP PLLC

By: s/ Stan Chelney

Stan Chelney

Philipp Smaylovsky

28 Liberty Street, 6th Floor

New York, NY 10005

(212) 653-0024

(212) 653-0020

stan@chelneylaw.com

philipp@chelneylaw.com

Attorneys for Defendant

Julius Strapek